

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

INSTITUTIONAL COST CONTRIBUTION  
REQUIREMENT FOR COMPETITIVE PRODUCTS

Docket No. RM2012-3

REQUEST OF THE UNITED STATES POSTAL SERVICE FOR EXTENSION  
(February 29, 2012)

In Order No. 1108, the Postal Regulatory Commission established Docket No. RM2012-3 to review the institutional cost contribution requirement for competitive products, in accordance with 39 U.S.C. § 3633(b).<sup>1</sup> The Commission set the deadline for initial comments on March 5, 2012, and the deadline for reply comments on April 2, 2012.<sup>2</sup>

On February 24, 2012, the Parcel Shippers Association (PSA) moved to extend the period for initial and reply comments until early 2013.<sup>3</sup> The Postal Service intends to file an answer to the PSA motion by March 2nd. Thus far, answers have also been filed by the Direct Marketing Association and the Public Representative.<sup>4</sup>

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<sup>1</sup> Order No. 1108, Notice of Proposed Rulemaking to Evaluate the Institutional Cost Contribution Requirement for Competitive Products, Docket No. RM2012-3 (Jan. 6, 2012).

<sup>2</sup> *Id.*

<sup>3</sup> Motion of the Parcel Shippers Association to Extend the Period for Preparing Initial and Revised Comments, Docket No. RM2012-3 (Feb. 24, 2012).

<sup>4</sup> Comments of the Direct Marketing Association, Inc. in Support of the Parcel Shippers Association Motion for Changes in Procedure Schedule, Docket No. RM2012-3 (Feb. 28, 2012); Public Representative Comments on Parcel Shippers Association Motion to Extend Initial and Reply Comment Period, Docket No. RM2012-3 (Feb. 29, 2012).

Under the Commission's rules, parties have until March 2nd to respond to PSA's motion.<sup>5</sup> Accordingly, it is unlikely that the Commission will be able to rule on PSA's motion before the March 5th deadline for initial comments. Therefore, pursuant to 39 C.F.R. § 3001.16, the Postal Service requests that the Commission provisionally extend the period for initial comments until a week after it rules on PSA's motion. Of course, if the Commission ultimately rules in PSA's favor, then the period for initial comments would be extended into next year.

The provisional extension sought by the Postal Service would resolve the uncertainty parties currently have as to whether they should prepare initial comments for filing on March 5th. And, it would result in the Commission having ample time to consider any answers received on March 2nd in response to PSA's motion before it issues a ruling. The Postal Service notes that 39 C.F.R. § 3001.16 permits the Commission to rule on the Postal Service's instant request without waiting for answers thereto.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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<sup>5</sup> 39 C.F.R. § 3001.21(b).

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